

CORPORATE SOCIAL RESPONSIBILITY POLICY

ALPHATEC AUDIO VIDEO PRIVATE LIMITED

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1. Introduction:

Alphatec Audio Video Private Limited (“AAVPL” or “the Company”) is involved in the business of distribution of Audio Video Equipment. In compliance with the requirements of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, the Company is committed to improve the lives of the society in which it operates. The Company believes in “looking beyond business and believes in sustainable development” and strives to create a positive impact on the communities it serves and on the environment. The Company is committed not just to profits, but also towards leaving a deeper imprint on the society as a whole. We understand that there is a need to strike a balance between the overall objectives of achieving corporate excellence vis- à-vis the company’s responsibilities towards the community.

2. Purpose:

The purpose of the Corporate Social Responsibility (CSR) Policy at **Alphatec Audio Video Private Limited (AAVPL)** is to formalize our commitment to ethical practices, sustainable development, and positive societal impact and is to establish a clear framework for our company’s social and environmental contributions. This policy provides a strategic framework to guide our social, environmental, and economic contributions, ensuring that our business operations align with the broader goal of fostering long-term value for our stakeholders, communities, and the environment. It defines our approach to sustainable business practices, outlines the key areas of focus for our CSR initiatives, and sets expectations for how we will measure and report on our progress.

3. Objectives:

Our CSR objectives include, but are not limited to:

Environmental Sustainability: Minimizing our environmental footprint by promoting energy efficiency, reducing waste, and supporting renewable resources.

Community Development: Contributing to the socio-economic development of communities by supporting local projects, education, and healthcare initiatives.

Ethical Labor Practices: Ensuring fair and humane working conditions within our organization and across our supply chain.

Employee Engagement: Encouraging our employees to take part in volunteer activities, develop their skills, and actively contribute to causes that align with our CSR goals.

Sustainable Business Practices: Integrating ethical business practices that promote long-term value for all stakeholders, including customers, employees, shareholders, and communities.

4. Definitions:

The terms defined in this CSR Policy shall have the meanings herein specified and terms not defined shall have the meanings as defined in the Companies Act, 2013 and Companies (Corporate Social Responsibility) Rules, 2014 including any statutory modifications or reenactments thereof.

“**Act**” means the Companies Act, 2013, as amended from time to time.

“**Administrative Overheads**” means the expenses incurred by the company for general management and administration of Corporate Social Responsibility functions in the company.

“**Average Net Profit**” means profit calculated as per Section 198 of the Companies Act, 2013.

“**Board**” means the Board of Directors of the Company.

“**Company**” means Alphatec Audio Video Private Limited.

“**CSR**” means Corporate Social Responsibility

“**CSR activities**” means the activities or projects or programmes as recommended by the CSR Committee and approved by the Board, undertaken by the Company from time to time in any one or more of the areas falling under the Schedule VII to the Companies Act, 2013.

“**CSR Committee**” means the Committee of the Board constituted under section 135 of the Act for the purpose of administration of CSR activities, supervising the adherence of this CSR Policy and the matter incidental thereto.

“**CSR Policy**” means the Corporate Social Responsibility Policy as set out herein and as amended or modified from time to time.

“**CSR Rules**” means Companies (Corporate Social Responsibility) Rules, 2014.

5. CSR Activities:

(i) The Company shall undertake the activities as recommended by the CSR committee and approved by the Board in accordance with the provisions of Section 135 of the Companies Act, 2013 read with Schedule VII and Companies (CSR Policy) Rules, 2014 including but not limited to:

a. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;

b. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;

c. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;

d. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;

e. Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;

f. Measures for the benefit of armed forces veterans, war widows and their dependents;

g. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;

h. Contribution to the Prime Minister's National Relief Fund (PMNRF) or any other fund set up by the Central Government for socioeconomic development and relief and welfare of the scheduled castes, the scheduled tribes, other backward classes, minorities and women;

i. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;

j. Rural development projects.

(ii) The CSR activities (either new or ongoing) shall be undertaken by the Company in accordance with this policy and shall exclude activities undertaken in pursuance of its normal course of business.

(iii) Subject to the provisions of section 135(5) of the Act, the CSR projects or programs or activities undertaken in India only shall qualify for CSR expenditure.

(iv) The CSR programs or projects or activities that benefit only the employees of the Company and their families shall not be considered as CSR activities in accordance with the Act

(v) Contribution of any amount directly or indirectly to any political party under section 182 of the Act shall not be considered as CSR activity.

(vi) Companies may build CSR capacities of their own personnel as well as those of their implementing agencies through Institutions with established track records of at least three financial years but such expenditure including expenditure on administrative overheads shall not exceed five percent of total CSR expenditure of the company in one financial year.

(vii) The CSR programs or projects or activities that benefit only the employees of the Company and their families shall not be considered as CSR activities in accordance with the Act.

(viii) Contribution of any amount directly or indirectly to any political party under section 182 of the Act shall not be considered as CSR activity.

(ix) Companies may build CSR capacities of their own personnel as well as those of their implementing agencies through Institutions with established track records of at least three financial years but such expenditure including expenditure on administrative overheads shall not exceed five percent of total CSR expenditure of the company in one financial year.

Any surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of a company.

6. CSR Committee:

The company has constituted a CSR committee consisting of Two (2) Directors from the Board of Directors to oversee the implementation of the CSR policy of the company in accordance with the requirements of Section 135 of the Companies Act.

The Committee, which will report to the Board, consists of the following Directors:

1. Mr. Devasis Barkataki
2. Mr. Kangkan Dutta

Mr. Devasis Barkataki will Chair the CSR Committee.

7. CSR Spending

The Company is obligated to allocate in each financial year a minimum of 2% of its average net profits from the preceding three financial years towards the implementation of the CSR Policy. The calculation of net profit and average net profit shall be carried out in accordance with the provisions of section 198 of the Act, in conjunction with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as maybe amended from time to time.

The amounts to be expended by the Company shall adhere to the provisions stipulated under the Act, as amended from time to time.

8. Monitoring the CSR Policy

CSR Committee shall:

- Formulate and recommend to the Board a CSR policy and activities to be undertaken by the company as per Schedule VII from time to time;
- Recommend the amount of expenditure to be incurred on the activities; and
- Monitor periodically the implementation of the projects/ programs/ activities undertaken by the Company and report to the Board on a regular basis the progress of CSR activities.

Any income arising out of CSR projects or activities approved by the Board shall not form part of the business profit of the Company and shall only be allocated to future CSR projects or activities.

9. Responsibilities of the Board of Directors

The Board of Directors of **Alphatec Audio Video Private Limited (AAVPL)** will be responsible for:

- Forming a CSR Committee comprising of Directors.
- Approving the CSR policy after considering the recommendations made by the CSR Committee.
- Ensuring that the Company makes profits, then the Company shall in each financial year spend at least 2% of the average net profit from the preceding three financial years.
- Disclosing in its Report the name of CSR Committee members and ensure annual reporting of its CSR activities on the Company website.

- Ensuring that only the activities as included in CSR Policy of the Company are undertaken by the Company.

10. Limitation, Review and Amendment

In the event of any conflict between the provisions of this Policy and of the Applicable Law, the provisions of Applicable Law shall prevail over this Policy. Any subsequent amendment/ modification to the Applicable Law shall automatically apply to this Policy.

The CSR Committee may review this Policy periodically and recommend amendments for the Board's approval from time to time, as may be deemed necessary.